

DEPARTMENT OF THE NAVY

BASE REALIGNMENT AND CLOSURE PROGRAM MANAGEMENT OFFICE WEST 1455 FRAZEE RD, SUITE 900 SAN DIEGO, CA 92108-4310

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Mr. Richard Muza Remedial Project Manager U.S. Environmental Protection Agency, Region IX 75 Hawthorne St (Mail Code SFD-8-1) San Francisco, CA 94105

Mr. Quang Than
Remedial Project Manager
California Department of Toxic Substances Control
Office of Military Facilities
5796 Corporate Ave.
Cypress, CA 90630

Mr. John Broderick Remedial Project Manager California Regional Water Quality Control Board 3737 Main Street, Suite 500 Riverside, CA 92501

Fellow Federal Facility Agreement (FFA) Representatives:

SUBJECT: FEDERAL FACILITY AGREEMENT APPENDIX A SCHEDULE UPDATE FOR OPERABLE UNIT 2C ANOMALY AREA 3, FORMER MARINE CORPS AIR STATION (MCAS) EL TORO, CALIFORNIA

This letter is written to request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Anomaly Area 3 requires a revised milestone deliverable date for the Draft Record of Decision (ROD) based on requiring additional time to resolve substantive technical comments on a preceding FFA deliverable. As discussed and agreed to at several Base Realignment and Closure Cleanup Team (BCT) meetings, the Navy and the California Regional Water Quality Control Board (RWQCB) are cooperatively working to resolve issues related to the Draft Proposed Plan. While the Navy and RWQCB counsels' have held a conference call to identify issues, additional meetings are planned. As such, the Navy will need additional time to evaluate all agency recommendations, coordinate issues with the BCT, and incorporate changes, as appropriate, into the Draft Final Proposed Plan and subsequent documents. For these reasons noted above, there is good cause for this extension.

Please note that the Navy will be aggressively working to resolve the Anomaly Area 3 issues as quickly as possible. We would appreciate your help in prioritizing this project with your

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respective agency's staff with the intent of accelerating this schedule. The following table identifies the primary submittal and the associated schedule extension relating to this request, which is made pursuant to FFA Sections 9.2(d) and 9.2(g). Enclosure (1) presents our FFA schedule (Appendix A) with the revised primary milestones included. Enclosure (2) presents the detailed project schedule with supporting document submittal dates.

Anomaly Area 3 Primary Submittal	Current Deliverable Date	Revised Deliverable Date	Extension
Draft Record of Decision	08-10-2009	09-17-09	~1 month

Thank you for your cooperation and continued support. Should you have questions or need additional information, please contact Ms. Content Arnold, Lead Remedial Project Manager at (619) 532-0790.

Sincerely,

ANTHONY MEGLIOLA Base Closure Manager By direction of the Director

- Enclosures: 1. Federal Facility Agreement Appendix A Schedule, Former MCAS El Toro (March 19, 2009)
 - 2. Comprehensive Schedule, Anomaly Area 3, Former MCAS El Toro (March 19, 2009)

Copy to:

Mr. Crispin Wanyoike, P.E. Senior Program Director Earth Tech AECOM 21064 Bake Parkway, Suite 200 Lake Forest, CA 92630

MARINE CORPS AIR STATION EL TORO

Federal Facility Agreement Appendix A

Submittal Milestones

Site 1 Soil (Former	Explosive Ordnance	Disposal [EOD	Training Range)

Primary Submittal	Deliverable Dat
Draft Remedial Investigation	06-03-2005
Draft Feasibility Study	01-29-2007
Draft Proposed Plan	03-24-2010
Draft Record of Decision	12-03-2010

Draft Final SubmittalDeliverable DateDraft Final Feasibility Study08-29-2008

Site 1 (Former EOD Training Range) 1 & Site 2 (Magazine Road Landfill)

Groundwater

Primary Submittal	Deliverable Date
Draft Proposed Plan	03-24-2010
Draft Record of Decision	12-03-2010

Draft Final SubmittalDeliverable DateDraft Final Feasibility Study12-22-2009

Sites 2 & 17 (Magazine Road and Communication Station Landfills)

Primary Submittal	Deliverable Date
Draft Final Remedial Design	07-19-2004
Draft Sites 2 and 17 Operation and Maintenance	09-14-2007
Plan	
Site 2 Draft Remedial Action Completion Report	10-24-2008
Site 17 Draft Remedial Action Completion Report	10-24-2008

Sites 3 & 5 (Original and Perimeter Road Landfills)

Primary Submittal	Deliverable Date
Draft Remedial Design/Remedial Action Work	09-02-2008
Plan*	
Draft Operation and Maintenance Plan/Long-Term	06-23-2009
Monitoring Plan**	
Draft Interim-Remedial Action Completion	04-07-2010
Report***	
Draft Operating Properly and Successfully Report	02-24-2011

* Includes Construction Quality Assurance (CQA) Plan, Construction Quality Control (CQC) Plan, and Contingency Plan

^{**} Includes Long-Term Contingency Plan

^{***}Equivalent to Project Closeout Report

MARINE CORPS AIR STATION EL TORO Federal Facility Agreement Appendix A

Submittal Milestones

Anom	aly	Area	3
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Primary Submittal	Deliverable Date
Draft Remedial Investigation/Feasibility Study	12-06-2005
Draft Proposed Plan	06-23-2008
Draft Record of Decision	<i>09-17-2009</i>

Sites 8 (DRMO Storage Yard) & 12 (Sludge Drying Beds)

Primary Submittal	Deliverable Date
Draft Remedial Design/Remedial Action Work	09-12-2007
Plan	
Construction Quality Assurance Plan	09-12-2007
Construction Quality Control Plan	09-12-2007
Draft Project Closeout Report	04-03-2009

Site 16 (Crash Crew Pit No. 2)

Primary Submittal	Deliverable Date
Draft Remedial Design/Remedial Action MNA	11-18-2003
Work Plan	
Draft Remedial Design	07-27-2005
Draft Operating Properly and Successfully Report	03-02-2006

Site 18 (VOC Regional Groundwater Plume)

Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	03-14-2005
Final Remedial Design (100% Design)	05-31-2005
Draft Operation & Maintenance Plan	01-11-2007
Draft Project Closeout Report / Interim – Remedial	05-14-2007
Action Completion Report	

Site 24 (VOC Source Area – Shallow Groundwater Unit)

Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	06-02-2004
Final Remedial Design (100% Design)	12-13-2004
Draft Operation & Maintenance Plan	01-11-2007
Draft Project Closeout Report / Interim - Remedial	05-14-2007
Action Completion Report	

El Toro _Comprehensive_03-2009_wd02.mpp Project: Former MCAS El Toro Date: Fri 3/20/09

Comprehensive Schedule Anomaly Area 3 Former MCAS El Toro

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ID	Task Name	Duration	Start	Finish				I						
2704	Anamaly Area 2	3298 days	Wed 7/27/05	Fri 3/16/18	'04	'05	'06	'07	80'	'09	'10	111	'12	'13
2784	Anomaly Area 3							.1	<u> </u>	Į	ļ	1	<u>,</u>	L
2785	RI/FS Report	759 days	Wed 7/27/05	Mon 6/23/08			-			:	1	:		:
2789	Draft RI/FS Report	32 days	Wed 10/19/05	Thu 12/1/05							· 	·		
2794	Regulatory Agency Review	112 edays	Mon 12/5/05	Mon 3/27/06	12/	5/05	3/2	7/06		ł	1			1
2795	Supplemental Groundwater Evaluation	176 days	Mon 6/12/06	Mon 2/12/07				₹		: 	! . <u>!</u>	! 	1	1
2808	Draft Final RI/FS	278 days	Mon 4/30/07	Wed 5/21/08	:		:	1			1	l .	:	;
2822	Regulatory Agency Concur/Dispute	23 days	Thu 5/22/08	Mon 6/23/08	!			5/22/	08 🛮 6/	23/08				j
2823	Final RI/FS	0 edays	Mon 6/23/08	Mon 6/23/08			1	1	 	/23/08	}:		3	:
2824	Proposed Plan	314 days	Thu 5/1/08	Tue 7/14/09			:	i		₹	: 		ļ	
2827	Draft PP	5 days	Tue 6/17/08	Mon 6/23/08			1	6/17/	08 6/	23/08		1	1	!
2828	Regulatory Agency Review (Appendix A: 6/23/08)	74 edays	Mon 6/23/08	Fri 9/5/08			:	6/23/	08 🗐 9	9/5/08	1	:	1	
2829	Draft Final PP	15 days	Mon 4/20/09	Fri 5/8/09			!	i i	4/20/0	9 [5/8	3/09		1	1
2830	Regulatory Agency Concur/Dispute	30 edays	Fri 5/8/09	Sun 6/7/09				1	5/8/0	9 [] 6/	7/09	:	:	: !
2831	Final PP	0 edays	Sun 6/7/09	Sun 6/7/09			!			, •	5/7/09		:	
2832	Preparation for Public Comment	5 days	Mon 6/8/09	Fri 6/12/09			1	1	6/8/	9 6/	12/09	!	1	i
2833	Public Comment	22 days	Mon 6/15/09	Tue 7/14/09	:			1	6/15/	09 [7	/14/09		1	
2834	Final Record of Decision	173 days	Wed 6/17/09	Sun 2/14/10	Ì		:	1			•	i i		: !
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2838	Responsiveness Summary	0 edays	Thu 9/17/09	Thu 9/17/09			1	1	1	•	9/17/0	9		1
2839	Regulatory Agency Review	60 edays	Thu 9/17/09	Mon 11/16/09		,	:	· ·	9/1	7/09 🛮	11/16	/09	1	
2840	Draft Final ROD	44 days	Tue 11/17/09	Fri 1/15/10				1	11/	7/09	1/15/	/10	ı	:
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Project: Former MCAS El Toro Date: Fri 3/20/09

Task

Progress Milestone ◆

Summary 🛡

El Toro _Comprehensive_03-2009_wd02.mpp Project: Former MCAS El Toro Date: Fri 3/20/09 Comprehensive Schedule Anomaly Area 3 Former MCAS El Toro Page 1 of 1

ID	Task Name	Duration	Start	Finish										
2784	Anomaly Area 3	3298 days	Wed 7/27/05	Fri 3/16/18	'04	'05	'06	'07	'08	'09	'10	'11	'12	'13
2785	RI/FS Report	759 days	Wed 7/27/05	Mon 6/23/08			<u> </u>							
2789	Draft RI/FS Report	32 days	Wed 10/19/05	Thu 12/1/05			!						!	
2794	Regulatory Agency Review	112 edays	Mon 12/5/05	Mon 3/27/06	12	/5/05	3/2	7/06	i					
2795	Supplemental Groundwater Evaluation	176 days	Mon 6/12/06	Mon 2/12/07									:	
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2842	Final ROD	0 edays	Sun 2/14/10	Sun 2/14/10			:		:	•	2/14	I/10	:	

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